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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**NOTICE OF JOINDER BY CLAIMANT
SOUTHERN NEVADA CULINARY AND
BARTENDER PENSION TRUST FUND IN
THE SECURITIES PLAINTIFFS'
MOTION FOR THE APPLICATION OF
BANKRUPTCY RULE 7023 AND THE
CERTIFICATION OF A CLASS OF
SECURITIES CLAIMANTS**

Date: August 8, 2023

Time: 10:00 a.m. (Pacific Time)

Before: Video Conference

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, California 94102

Objection Deadline: July 25, 2023,
4:00 p.m. (Pacific Time)

1 Southern Nevada Culinary and Bartender Pension Trust Fund (“**Claimant**”), the holder of a
2 Securities Claim and a creditor in the Chapter 11 Bankruptcy Cases (the “**Chapter 11 Cases**”) of
3 the above-captioned reorganized debtors (the “**Debtors**”), hereby submits this Notice of Joinder (the
4 “**Joinder**”) to *Securities Plaintiffs’ Motion for the Application of Bankruptcy Rule 7023 and the*
5 *Certification of a Class of Securities Claimants* (the “**Rule 23 Motion**”) [Docket No. 13865].¹ In
6 support of this Joinder, Claimant respectfully states as follows:

7 **JOINDER AND RESERVATION OF RIGHTS**

8 1. Claimant timely filed a proof of claim against the Debtors on April 16, 2020 in
9 accordance with the Extended Bar Date Order.² In addition, Claimant timely submitted all
10 supplemental trading information requested by the Debtors on April 22, 2021, in compliance with
11 the Order Approving Securities ADR and Related Procedures For Resolving Subordinated
12 Securities Claims (the “ADR Procedures Order”).

13 2. Claimant has reviewed the Rule 23 Motion, joins it in full, and reserves all rights.

14 3. Claimant strongly agrees with the Securities Plaintiffs that class certification is the
15 only way to effectuate the fair and expeditious resolution of all pending Securities Claims. For the
16 reasons explained in the Rule 23 Motion, Claimant agrees that class certification would ameliorate
17 the myriad problems and obvious inefficiencies that will arise if all Securities Claimants with
18 pending Securities Claims must pursue the merits of their claims individually. Claimant further
19 agrees that Securities Claimants, the Reorganized Debtors, and the Court will all benefit from the
20 procedures and protections provided by class certification under Rule 23.

21 4. Claimant believes that the Securities Plaintiffs, along with their counsel, have
22 demonstrated their willingness and ability to serve as class representatives and class counsel. Thus,
23 it is Claimant’s position that the Rule 23 Motion should be granted.

24
25 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Rule 23
26 Motion.

27 ² See Order (I) Denying Securities Lead Plaintiff’s Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim and
28 (II) Extending Bar Date For Certain Holders of Securities Claims For Rescission or Damages (ECF No. 5943) (the
“Extended Bar Date Order”).

1 **CONCLUSION**

2 For all of the foregoing reasons, Claimant respectfully joins the Rule 23 Motion.

3 Dated: July 24, 2023

Respectfully submitted,

4 McCRACKEN, STEMERMAN & HOLSBERRY, LLP

5 

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